



Terry Tamminen
Agency Secretary
Cal/EPA



Department of Toxic Substances Control

8800 Cal Center Drive
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Arnold Schwarzenegger
Governor

September 13, 2004

Mr. Marshall Cloud
Remedial Project Manager
Defense Distribution Depot – Tracy Site
Post Office Box 960001
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CONCURRENCE WITH THE REVISED DRAFT FINAL REMEDIAL ACTION REPORT (RAR) FOR SOLID WASTE MANAGEMENT UNIT (SWMU) 8 LARGE EXCAVATION SITE AT DEFENSE DISTRIBUTION DEPOT SAN JOAQUIN (DDJC) – TRACY SITE, TRACY, CALIFORNIA

Dear Mr. Cloud:

The Department of Toxic Substances Control (DTSC), received the Revised Draft Final SWMU 8 RAR, dated July 2004, on July 26, 2004. The RAR describes the remedy implementation including the excavation of over 17,000 cubic yards of pesticide contaminated soil with offsite disposal to Class 1 and Class 2 landfills, the results of confirmation samples collected, and the placement of clean fill between September and December 2002 at SWMU 8, the former burn pit at DDJC-Tracy. The confirmation samples collected from the base and sidewalls of the excavation show that the maximum detections of 47 µg/kg and 4 µg/kg for dichlorodiphenyltrichloroethane (DDT) and dieldrin, respectively, were below the cleanup standards for SWMU 8. The cleanup standards, established in the 1998 Site-Wide Comprehensive Record of Decision (ROD) and revised in the 2004 Final Explanation of Significant Differences to the Sitewide Comprehensive Record of Decision (ESD), are 103 µg/kg for DDT and 5 µg/kg for dieldrin.

Background

The original cleanup standards specified in the 1998 Site-Wide Comprehensive ROD for DDT and dieldrin of 7 µg/kg and 2 µg/kg, respectively, were based on potential for impacts to groundwater using limited data. These cleanup standards were reevaluated after the excavation failed to meet the cleanup standards. The 2004 ESD revised the cleanup standards based on further Dionized Water Waste Extraction Test (DI WET) results and vadose zone modeling using SESOIL and VLEACH simulations. For

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comparison, the United States Environmental Protection Agency's Region 9 Preliminary Remediation Goals for residential soil use for DDT and dieldrin are 1700 µg/kg and 30 µg/kg, respectively. Two new long-term monitoring wells, LM178AU and LM097AUA were installed downgradient and within the excavation area on February 23, 2003, to monitor ground water.

In conclusion, DTSC concurs that the residual contaminant levels present at SWMU 8 satisfy the revised cleanup standard set in the 2004 ESD and are protective of human health and the environment for unrestricted land use. No Institutional Controls are necessary for SWMU 8.

If you have any questions or comments regarding this letter, please contact the Project Manager, Mr. Peter MacNicholl at (916) 255-3713 or e-mail at pmacnich@dtsc.ca.gov.

Sincerely,

A handwritten signature in black ink, reading "Anthony J. Landis". The signature is written in a cursive, flowing style.

Anthony J. Landis, P.E.
Chief
Northern California Operations
Office of Military Facilities

cc: See next page.

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